

BSF

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October 1, 2024

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Jane Doe v. Russell Wendell Simmons, 1:24-cv-01043-JGK

Your Honor:

On behalf of Plaintiff Jane Doe, we write pursuant to ¶ VI(A)(2) of Your Honor's Individual Practices and Rules to request permission to file under seal the transcript of Defendant's deposition taken on September 26, 2024, which is referenced in and will be attached as Exhibit A to Ms. Doe's forthcoming letter submission regarding the status of discovery in this case pursuant to ECF No. 54.

We are seeking approval to file the deposition transcript under seal because (1) pursuant to the parties' protective order, "[d]uring the 30-day period following a deposition, all Parties will treat the entire deposition transcript as if it had been designated Confidential (ECF No. 39 at 3); and because (2) the Court granted Ms. Doe permission to proceed anonymously (ECF No. 9), and the transcript identifies Ms. Doe by name. To protect Ms. Doe's anonymity, we respectfully request that Your Honor grant us permission to file the deposition transcript under seal.

We have conferred with Defendant's counsel on this issue, and they are unopposed.

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Kenya K. Davis

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**APPLICATION GRANTED
SO ORDERED**



John G. Koeltl, U.S.D.J.

10/2/24

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cc: Counsel of Record (via ECF)
